



U.S. Department of Justice

United States Attorney  
Southern District of New York

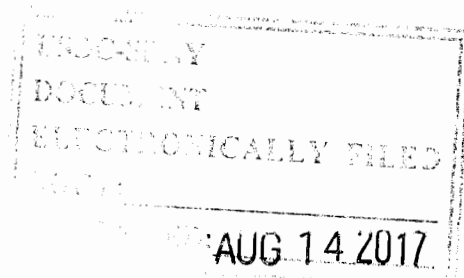
The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

**MEMO ENDORSED**

August 10, 2017

**BY ECF**

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

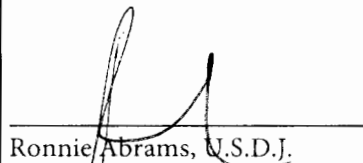


**Re: United States v. Jason Galanis, et al.,  
SI 16 Cr. 371 (RA)**

Dear Judge Abrams:

The Government writes in advance of its initial rolling production of responsive emails from the email accounts of Devon Archer, Bevan Cooney, and others, to respectfully request that the Court enter the attached protective order (the "Protective Order"). The Government notes that counsel for Mr. Archer has objected to the Protective Order on the grounds that it does not impose reciprocal limitations on the Government's use of any confidential materials. The Government does not believe that any modification to the Protective Order, which is modelled on the Government's standard protective order, is warranted.

Paragraph 7 of the proposed Protective Order refers to "July 18 Materials" and "materials designated Confidential Materials by defense counsel." The proposed Protective Order does not define "July 18 Materials" and does not otherwise discuss "materials designated . . . by defense counsel." The Government shall explain why this language is included or submit a revised proposal by August 17, 2017. SO ORDERED.

  
Ronnie Abrams, U.S.D.J.  
August 14, 2017

Respectfully submitted,

JOON H. KIM  
Acting United States Attorney

By: /s/ Rebecca Mermelstein  
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Rebecca Mermelstein  
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cc: All defense counsel (by ECF)